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8 Attorneys for the United States

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11 IN THE UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA

13  
14 UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
APPROXIMATELY \$10,000.00 IN  
U.S. CURRENCY, AND  
MONEY ORDER VALUED AT \$1,000.00  
IN U.S. CURRENCY,  
Defendants.

15 STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimants Efren  
Pacheco and Freeway Packaging and Glass, LLC (“claimants”), by and through their respective counsel,  
as follows:

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22 1. On or about April 12, 2023, claimants filed claims in the administrative forfeiture  
proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$10,000.00 in U.S.  
23 Currency and a Money Order valued at \$1,000.00 in U.S. Currency (hereafter “defendant funds”), which  
24 were seized on February 8, 2023.

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28 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required  
by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has

1 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

2       3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
3 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are  
4 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
5 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.

6 That deadline is July 11, 2023.

7       4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
8 October 10, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
9 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
10 forfeiture.

11       5. Accordingly, the parties agree that the deadline by which the United States shall be  
12 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
13 alleging that the defendant funds are subject to forfeiture shall be extended to October 10, 2023.

14 Dated: 7/7/2023

PHILLIP A. TALBERT  
United States Attorney

15 By: /s/ Kevin C. Khasigian  
16 KEVIN C. KHASIGIAN  
17 Assistant U.S. Attorney

18 Dated: 7/5/2023

/s/ Jacek W. Lentz  
JACEK W. LENTZ  
19 Attorney for potential claimants  
Efren Pacheco and  
20 Freeway Packaging and Glass, LLC

21 (Signature authorized by phone)

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23       **IT IS SO ORDERED.**

24 Dated: \_\_\_\_\_

25 \_\_\_\_\_  
26 United States District Judge

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